

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

UNITED STATES OF AMERICA

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v.

Criminal No: 3:17-CR-00155-L (2)

JAMSHID NORIYAN, et al.

**DEFENDANT DAVID NOURIAN’S RESPONSES TO
THE GOVERNMENT’S EXHIBIT OBJECTIONS**

Defendant Deshid “David” Nourian (“Nourian”), by and through his undersigned counsel, files the below responses to the Government’s Objections to Mr. Nourian’s Witnesses and Exhibits (Dkt. 601). Mr. Nourian respectfully requests that the Court overrule each objection for the reasons outlined below.

<u>Ex. Nos.</u>	<u>Objection</u>	<u>Response</u>
1–2 (Bank Documents)	FRE 802, 901	Objections withdrawn per meet and confer
3–4 (Email Communication and Handwritten Note)	FRE 402, 403, 602, 802, 901	Relevant to substantive indictment counts; probable Government witness has personal knowledge; applicable hearsay exception – then-existing state of mind; testimony or evidence will be adduced at trial to authenticate exhibits
5–6 (Lease Documents)	FRE 802, 901	Non hearsay - not offered for truth of the matter asserted; testimony or evidence will be adduced at trial to authenticate exhibits
8 (Property Documents)	FRE 402, 403, 802, 901	Relevant to substantive indictment counts; applicable hearsay exception – public record; self-authenticating document
9 (Handwritten Note)	FRE 602, 802, 901	Possible defense witness has personal knowledge; applicable hearsay exception – then-existing state of mind; testimony or evidence will be adduced at trial to authenticate exhibits
10–13 (Property Documents)	FRE 402, 403, 802, 901	Relevant to substantive indictment counts; applicable hearsay exception –

		pubic record; self-authenticating documents
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Mr. Nourian reserves the right to amend or supplement the above responses, subject to rulings of the Court or submissions of the parties.

Dated: August 28, 2023

Respectfully submitted,

/s/ Scott C. Thomas

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CERTIFICATE OF CONFERENCE

A telephone conference was held on August 24, 2023, between Mr. Nourian's counsel and the Government on the merits of the Government's objections. A reasonable effort has been made to resolve the objections, but the parties were unable to resolve each one. Therefore, the above objections are presented to the Court for determination.

/s/ Scott C. Thomas
Scott C. Thomas

CERTIFICATE OF SERVICE

I certify that on August 28, 2023, I served upon all counsel of record a true and correct copy of this motion by filing it with the Court's CM/ECF system.

/s/ Scott C. Thomas
Scott C. Thomas